

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 18-CR-20489
Judge Thomas L. Ludington

vs.

JAMES D. PIERON, JR.,
Defendant.

STIPULATION TO EXTEND TIME TO FILE
OBJECTIONS TO PRESENTENCE REPORT

The United States of America and Defendant James D. Pieron, Jr., by and through their respective counsel, stipulate and agree to the following:

1. Kenneth R. Sasse was one of the attorneys who represented Defendant at the trial of this case. Mr. Sasse withdrew as counsel following the conviction when it appeared that he might be called as a witness at post-trial hearings. These hearings have now been concluded.

2. Mr. Sasse has filed a new appearance as counsel for Defendant to provide representation until and through the sentencing hearing in this matter.

3. Mr. Sasse first obtained the Presentence Investigation Report yesterday, February 22, 2021. He requests additional time to consult with his client and file possible objections to the Presentence Investigation Report.

4. Objections to the Presentence Investigation Report are presently due today, February 23, 2021.

5. An Order should enter allowing each party until March 2, 2021 (an extension of one week) to file objections to the Presentence Investigation Report.

Dated: February 23, 2021

s/ JULES M. DePORRE (with consent)

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s/ KENNETH R. SASSE

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Upon Stipulation of the parties, and for the reasons stated
therein,

IT IS HEREBY ORDERED that the time within which the parties
may file objections to the Presentence Investigation Report in this matter is
extended until March 2, 2021.

Dated: March 2, 2021

s/Thomas L. Ludington
THOMAS L. LUDINGTON
United States District Judge